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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
17 LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF JEFF NARDINELLI  
IN SUPPORT OF WAYMO'S  
OPPOSITION TO DEFENDANTS'  
MOTION TO EXCLUDE MICHAEL  
WAGNER**

1 I, Jeff Nardinelli, hereby declare as follows.

2 1. I am a member of the bar of the State of California and an associate with Quinn  
3 Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Waymo LLC ("Waymo"). I make this  
4 declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and  
5 would testify competently as follows.

6 2. Attached as Exhibit 1 is a true and correct copy of an excerpt of the deposition of  
7 John Bares, taken on June 16, 2017.

8 3. Attached as Exhibit 2 is a true and correct copy of an excerpt from the deposition of  
9 Cameron Poetzsch, taken on June 19, 2017.

10 4. Attached as Exhibit 3 is a true and correct copy of an excerpt from the deposition of  
11 Ninjun Qi, taken on June 22, 2017.

12 5. Attached as Exhibit 4 is a true and correct copy of a document produced by Uber  
13 bearing Bates number UBER00068982.

14 6. Attached as Exhibit 5 is a true and correct copy of a document produced by Uber  
15 bearing Bates number UBER00068983.

16 7. Attached as Exhibit 6 is a true and correct copy of the Expert Reply Report of  
17 Michael J. Wagner, dated September 14, 2017.

18 8. Attached as Exhibit 7 is a true and correct copy of a document produced by Uber  
19 bearing Bates number UBER00232630.

20 9. Attached as Exhibit 8 is a true and correct copy of an email between Lindsay  
21 Cooper, counsel for Waymo, and Sylvia Rivera, counsel for Uber, dated September 14, 2017.

22 10. Attached as Exhibit 9 is a true and correct copy of a document produced by Uber  
23 bearing Bates number UBER00100345.

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25 I declare under penalty of perjury under the laws of the State of California that the  
26 foregoing is true and correct.  
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DATED: September 22, 2017

/s Jeff Nardinelli  
Jeff Nardinelli

**SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Jeff Nardinelli.

/s/ Charles K. Verhoeven  
Charles K. Verhoeven